

Improvement Area: Formatting

Scope

Formatting refers to the organization and layout of labels/labeling. The scope of work for this area of label improvement includes the master and marketplace labels. Areas for label improvement include:

- Location, order and prominence of required label elements, including but not limited to
 - Storage and Disposal,
 - First Aid,
 - Precautionary Statement,
 - Personal Protective Equipment, and
 - Optional label language, for example, comparative claims;
- Physical formatting elements, for example, spacing and text size;
- The use of securely attached, detachable booklets, brochures/pamphlets;
- Advisory language versus mandatory statements;
- Multiple Products Packed Together (MPPT) or kits/co-packs – outer/inner packaging, and acceptable combinations.

To accomplish the scope of work, the Formatting Improvement Team may divide into subgroups each of which may focus on different product types. Dividing into subgroups would allow the team to expand on the specifics for that particular product type.

Team Members

Formatting Improvement Team members should include State, Tribal, and Territorial pesticide regulatory officials including registration reviewers and enforcement/compliance label reviewers. The team should also include members of Industry and Industry Associations along with EPA officials. The team may want to include members from industries/organizations that are indirectly related to pesticides; for example, marketing and SDS globalization harmonization. The team may also want to include other government agencies undertaking labeling activities, for example, the Food and Drug Administration

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Resources

In addition to the resources listed previously, the Formatting Improvement Team may find the following resources beneficial:

- EPA's Pesticide Labeling Questions & Answer [[HYPERLINK "https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers"](https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers)]; and
- EPA's Pesticide Label Review Training [[HYPERLINK "https://www.epa.gov/pesticide-labels/pesticide-label-review-training"](https://www.epa.gov/pesticide-labels/pesticide-label-review-training)] .

Deliverables

Deliverables are categorized as short or long-term. Completion of the short-term deliverables will build wholesale consensus that will be utilized to formulate the long-term deliverables

Short-term Deliverables:

- White Paper informing broad stakeholder groups of complex issue.
- Question & answer document,
- List of “top ten” label formatting pain points, specific concerns and how to address them.
- Consideration of barriers to formatting improvements and how best to address those barriers.

Long-term Deliverables:

- Label template to serve as “Gold Standard”,
- Links to formatting standards,
- Label Formatting Manual,
- Issue Paper – Document significant issues of national concern and recommendations for consideration by Full SFIREG.

Timeline

The timeline for the Formatting Improvement Team may depend on how the work will be divided into potential sub groups. The timeline will differ for short term and long-term deliverables. It is estimated that completion of the short-term deliverables will be six months with the completion of long-term deliverables estimated at one year. . This team should conclude their work prior to or simultaneously with the Directions for Use and Language (DFUL), Claims, and Enforceability Improvement Teams since there may be some overlap on these topics.

Barriers

The Core Team has identified several barriers that the Formatting Implementation Team may need to address as they are working on the formatting issues for pesticide labels. These barriers include items such as:

- How does this group adequately identify formatting for different pesticides (ex. topical repellents vs. agricultural products)?
- How does the intended audience influence the formatting of a label?
- Should formatting be more obviously modular therefore allowing for the selection of pertinent components based on audience, type of pesticide, etc.?
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